

EXHIBIT A

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

DOCKET #	DATE FILED	DEFENDANT'S POSITION	COUNTERVAILING INTERESTS ¹
231	6.20.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	C1-1 C1-2 C1-3 C1-4
232	6.20.16	Redact all Non-Party witness names and identifying information.	C1-1 C1-2 C1-3 C1-4
232-7	6.20.16	Redact all Non-Party witness names and identifying information.	C1-1 C1-2 C1-3 C1-4
232-8	6.20.16	Keep sealed – Non-Party reliance on Protective Order	C1-1 C1-2 C1-3 C1-4
232-9	6.20.16	No objection to unsealing	
232-10	6.20.16	No objection to unsealing	
232-11	6.20.16	No objection to unsealing	

¹ Key:

CI-1 - Reasonable reliance the Protective Order by a party or non-party.

CI-2 - Prevention of the abuse of court records and files.

CI-3 - Annoyance, embarrassment, oppression, undue burden (“Privacy Interests”).

CI-4 - Preserving the fundamental rights of suspects or others under criminal investigation – including due process right to a fair trial and impartial jury unimpaired by excessive publicity, release of potentially inadmissible evidence for the Criminal Action, or improper revelation of a potential witness or their potential testimony.

CI-5 - Improper submission of documents thereby weaponizing judicial documents.

CI-6 - Untrustworthy, unreliable, and incorrect information.

CI-7 - Non-Judicial Documents.

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255	6.28.16	No objection to unsealing	
257	6.28.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-2² CI-3 CI-4 CI-5 CI-6 CI-7
258	6.28.16	Keep sealed – Non-Party reliance on Protective Order	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-1	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-2	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6

² Ms. Maxwell notes that Response Brief is filled with irrelevant information and misleading deposition excerpts that are wholly irrelevant to the underlying motion for sanctions for failure to comply with discovery obligations relating to plaintiff's medical information. These arguments were made, and documents filed, for purposes of distraction and harassment, and have nothing to do with the issues presented by the motion. This is classic abuse of the courts records and files. The Response and Exhibits were not referenced in the Order, and the exhibits are not properly considered judicial documents.

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			CI-7
258-3	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-4	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-5	6.28.16	No objection to unsealing	
258-6	6.28.16	No objection to unsealing	
258-7	6.28.16	No objection to unsealing	
258-8	6.28.16	No objection to unsealing	
258-9	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-10	6.28.16	No objection to unsealing	
261	7.1.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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269	7.8.16	No objection to unsealing	
270	7.8.16	No objection to unsealing	
270-1	7.8.16	No objection to unsealing	
270-2	7.8.16	Redact all Non-Party witness names and identifying information.	CI-1 CI-2 CI-3
270-3	7.8.16	No objection to unsealing	
270-4	7.8.16	No objection to unsealing	
270-6	7.8.16	No objection to unsealing	
272-1	7.12.16	Keep Sealed	CI-6 CI-7
272-2	7.12.16	No objection to unsealing	
272-3	7.12.16	No objection to unsealing	

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272-4	7.12.16	No objection to unsealing	
272-5	7.12.16	Already publicly filed (DE 45)	
272-6	7.12.16	Already publicly filed (DE 31)	
272-7	7.12.16	Keep sealed (Already released?)	CI-2 CI-3 CI-4 CI-5
272-8	7.12.16	No objection to unsealing	
272-9	7.12.16	No objection to unsealing	
272-10	7.12.16	Redact all Non-Party witness names and identifying information.	CI-1 CI-2 CI-3
303	7.25.16	No objection to unsealing	
304	7.25.16	No objection to unsealing	

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304-1	7.25.16	No objection to unsealing	
304-2	7.25.16	No objection to unsealing	
304-3	7.25.16	No objection to unsealing	
304-4	7.25.16	No objection to unsealing	
313	7.29.16	Already publicly filed	
313-1	7.29.16	No objection to unsealing	
279	7.13.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4
280	7.13.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4

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280-1	7.13.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
280-2	7.13.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-6
288	7.15.16	Not sealed	
288-1	7.15.16	Not sealed	
288-2	7.15.16	Not sealed.	

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289	7.18.16	Not sealed	
290	7.18.16	Redact identifying information and email address.	CI-1 CI-2 CI-3
291	7.18.16	Not sealed	
291-1	7.18.16	No position. Not sealed at 188-1	
291-2	7.18.16	Keep sealed	CI-2 CI-3 CI-4 CI-7

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291-3	7.18.16	Keep sealed	CI-2 CI-3 CI-4 CI-7
300	7.22.16	Not sealed	
300-1:2	7.22.16	Not sealed	
337	8.8.16	Not sealed	
338	8.8.16	Keep sealed	CI-1 CI-3 CI-4 CI-6

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338-2	8.8.16	Keep sealed	CI-7
338-3	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-4	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-7
338-5	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-6	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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338-7	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-8	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-9	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-10	8.8.16	No objection to unsealing	
353	8.10.16	Redact all Non-Party witness names and identifying information	CI-1 CI-3

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375	8.17.16	Not sealed	
315	7.29.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
316	7.29.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
316-1	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-2	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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316-3	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-4	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-5	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-6	7.29.16	Keep sealed	CI-1
316-7	7.29.16	Keep sealed –Reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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316-8	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
339	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4
340	8.8.16	Keep sealed	CI-1 CI-4
340-1	8.8.16	Keep sealed	CI-1 CI-4
340-3	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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340-4		Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
340-5		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
340-6		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
340-7		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
340-8		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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340-9	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
368	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
369	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
369-1	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-2	8.12.16	Keep sealed	CI-1

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369-3	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
369-4	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-5	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-6	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-7	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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369-8	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-9	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-10	8.12.16	Keep sealed	CI-2 CI-6 CI-7
369-11	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-12	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

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369-13	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-14	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-15	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-16	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
320	8.1.16	Keep Sealed	CI-1 CI-3

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321	8.1.16	Not sealed	
321-1	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-2	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-3	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-4	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6

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321-5	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-6	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
322	8.1.16	Not sealed	
323	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
329	8.2.16	Not Sealed	

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335	8.8.16	No objection to unsealing.	
336	8.8.16	No objection to unsealing.	
336-1	8.8.16	No objection to unsealing.	
336-2	8.8.16	No objection to unsealing.	
336-3	8.8.16	No objection to unsealing	

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380	8.18.16	No objection to unsealing.	
381	8.18.16	No objection to unsealing.	
381-1	8.8.16	No objection to unsealing.	
381-2	8.8.16	No objection to unsealing.	
381-3	8.8.16	No objection to unsealing.	

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381-4	8.8.16	No objection to unsealing – Redacted version released by Second Circuit	
381-5	8.8.16	No objection to unsealing – Redacted version released by Second Circuit	
381-6	8.8.16	No objection to unsealing	
381-7	8.8.16	No objection to unsealing – Redacted version released by Second Circuit	
381-8	8.8.16	No objection to unsealing	

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392	8.23.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
393	8.23.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
393-1	8.23.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
393-2	8.23.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
393-3	8.23.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-7

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393-4	8.23.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-7
400	8.25.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4
401	8.25.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4
401-1	8.25.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5
401-2	8.25.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5

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401-3	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
401-4	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
401-5	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
401-6	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7